

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT

ERIC ANDREW PEREZ,
Plaintiff,

14 CV 6625

-against-

DECLARATION IN SUPPORT OF
CIVIL RIGHTS COMPLAINT

Claim No. _____

Named Defendants,

Defendants.

JURY TRIAL DEMANDED

STATE OF FLORIDA)
)
COUNTY OF PASCO) ss.:

I, Eric Andrew Perez, being duly sworn, hereby depose and say:

1. I am the proposed Plaintiff in the above entitled action and make this affidavit in support of my civil rights claim. I originally had written this declaration as an affidavit in support of my motion to file a late claim in the NY Court of Claims, but giving the State or any other State authority access to my complaint would mean my certain rearrest; or worst. The state as the primary arm perpetrating this is deliberately and depravedly indifferent to the plaintiff.

2. As I understand the Court of Claims Act, there are six factors which are to be considered on an application such as this. They are: (a) whether the delay in filing was excusable; (b) whether the State had notice of the essential facts constituting the claim; (c) whether the State had an opportunity to investigate the underlying circumstances; (d) whether the claim is meritorious; (e) whether the failure to timely file resulted in substantial prejudice to the State; and (f) whether I have any other available remedy.

3. As a lay person, I was not aware of the filing period set forth in the Court of Claims Act. This lack of knowledge was compounded by incarceration in the state prison system, 3.1 being made

the subject of the “Coercive Population Control Prison Program”, lack of legal references, 3.2 the pursuit of my post-conviction motions, my limited ability to confer with counsel, 3.3 Plaintiff's 180 day incarceration in the SHU, and my lack of access to legal references which apply to the Court of Claims in JCJ & NYSDOCS. I respectfully request that the court consider the handicaps and conditions under which I must make my claim as outlined in this point; which will be further described in my affidavit in support of the claim, and the claim itself. I am making this claim as a New York and Federal Constitutional Claim, which allows for (3) years time make a claim.

3.1 Coercive Population Control Prison Program

I was incarcerated in Jefferson County Jail, JCJ¹ for the period of August 4, 2011 to March 8, 2012. Plaintiff suffered prejudiced while incarcerated in JCJ due to the following factors:

(a) I was deliberately made the subject of the “Coercive Population Control Prison Program” in JCJ and NYS DOCS:

As a pretrial detainee in JCJ I was deliberately made the subject of the “Coercive Population Control Prison Program” which involved my deliberate harassment, defamation, intimidation, embarrassment, the denial of my psychotropic medications, and torture on a daily basis in order to inflict the highest level of unwanted psychological and physical duress. I was deliberately cut off from the outside world by the denial of incoming mail which at times interfered with my legal process, the denial of telephone calls to friends and family, and the use of illegal court action so that the scenarios depicting the kidnapping, rape, and murder of my daughters in the re scripted television programming shown on the closed circuit television system in JCJ and the skits performed by the JCJ inmates could inflict the maximum unwanted psychological pressure on the subject. Every inmate in JCJ was given information on me, shown what I looked like, told that I was a gay snitch, and given instructions on

¹ Jefferson County Jail

how to act towards me by the Sheriff Deputies in JCJ. Each civilian employee of JCJ, inmate, and Sheriff Deputy understood that I was an enemy of this company and acted accordingly. JCJ was transformed into a living breathing organism which acted against me. The Deputies took direction and orders from unknown law enforcement personnel who monitored the jail's activity from a building a few hundred yards away.

Initially, I was classified by Officer Patterson on Friday August 5, 2011 @ 1:59 pm. I was classified as an Administrative Segregation Inmate diagnosed with Bipolar who had several suicide attempts, please see exhibit 3.1 Inmate Classification sheet dated 8/5/2011. The Plaintiff was then placed in general population in POD 2B and denied his psychotropic medications, and deliberately made the subject of JCJ and its snitch inmates who are used as actors. The inmates of JCJ were used as actors and played along with skits created on a daily by Sheriff Deputies who on a daily basis called certain inmates such as Gary Collins to the classification office in order to disseminate the information about the skits to the inmates of the POD who followed the instructions of the inmate who was chosen to go to classification. The skits were designed to harass, embarrass, defame, intimidate, annoy, and cause unwanted psychological pain to the Plaintiff. Each of the skits supposedly involved real event of my life and ex-wife. Much of my embarrassment was based on contrived information such as the fact that my penis was too small to keep my ex-wife known as "It" sexually satisfied. Rumors of her affairs were deliberately disseminated throughout JCJ and it was even rumored that she was with several of the Sheriff Deputies to include deputies and other members of the Jefferson County Drug Task Force. Contrived facts disseminated in reference to my ex-wife and I were that she did everything for me which included being a snitch for different law enforcement agencies. Plaintiff has not been involved in illegal activity for over 10 years so there should be no reason for anyone to report or do anything for the Plaintiff.

The skits and scenarios were also very involved and well produced in the form of re scripted

television programming. The re-scripted television shows broadcast on the closed circuit television system in JCJ featured the Plaintiff, his ex-wife, children, family members, and people whom were and still are unknown to him with their names and likenesses in scenarios designed to harass, embarrass, intimidate, annoy, and cause unwanted psychological pain to the Plaintiff. Each night at a certain time the Sheriff Deputies were instructed to turn on the television to a certain channel so that a particular scenario in the form of a television broadcast could be broadcast to the POD I was in. Accompanied by the television broadcast would also come the sounds of Deputies banging, laughing, yelling, and at times playing a tape recording of a female's blood curdling screams within the wet wall of the cells I was in. The scenarios were used to broadcast updates and messages Documents in my personal property such as a transcript I had written and resume were used in the creation of the skits and scenarios. The Plaintiff's FBI file, private information to include family history & information, NYPD test scores, FSOE (Foreign Service Officer Examination) test scores, work history, education history, classified information related to the Plaintiff, and other contrived information were released to the general inmate population of JCJ, and then disseminated to the NYS DOCS by correctional officers, and inmates from other upstate jails and JCJ. I was also physically assaulted on six different occasions by sheriff deputies and on two separate occasions by inmates during my incarceration in JCJ. The Plaintiff has been made to fight for his life on a daily basis as a result of this.

(b) The "Coercive Population Control Prison Program" which was designed by the United States government and implemented in JCJ and NYS DOCS in order to accomplish the following illegitimate government goals: 1) control the jail population through the use of coercive measures, 2) turn inmates into confidential informants & state actors, 3) encourage cooperation between inmates and various law enforcement agencies who have free access and control of JCJ; allowing Law enforcement agents to have total control of illegal activity in Watertown and surrounding areas, 4) intelligence gathering with information dissemination as directed under various agents under state and federal color of law; the

dissemination of information at times will contain a combination of disinformation or noise and accurate information based on the needs of this company; the information is disseminated by the inmates via telephone calls; written correspondence; visits; and the Sheriff Deputies, 5) allow inmates opportunities to receive reduced sentences or to be set free from JCJ for their cooperation in the “Coercive Population Control Prison Program”, 6) allow law enforcement and inmates to operate in such a way to satisfy their desires to be cruel; evil; & sadistic, 7) the willful and deliberate inoculation of prison society to an illegal system designed to control them and deliberately restrain them of life and liberty using various methods of psychological and physical controls, 8) the illegal perpetuation of threat groups such as gangs; criminal organizations; criminal activity; with the illegal intelligence gathering & dissemination of gang materials; private information of citizens and inmates; court documents & case information; law enforcement information & tactics; the deliberate leak of classified information to inmates; state actors; and others, 9) to provide entertainment to the sick sadistic Sheriff Deputies and inmates, 10) the “Program²” creates a situation which inflates the budgets of various law enforcement agencies who receive Federal Funding to include the Jefferson County Sheriff’s Office which allows law enforcement agents to receive overtime; receive special training; promotions; assignment to special task forces; and privileges they would not ordinarily have the opportunity to have in this small town and others; due to the fact that its citizens to include children are deliberately placed in danger, 11) the deliberate attempt to control and inoculate society by placing every citizen under the color of law whether state or federal and degradation of the same society by making this situation acceptable by using the Plaintiff; ex-wife; family; and children as the center of this written ever evolving saga and system using their stories as entertainment; & as a way to dupe citizens into becoming involved in something, 12) to control a geographic area such as Watertown with this

² Describes the series of circumstances and rules that inmates are faced with on a daily basis which countermand the written law on the books.

“Program” through the hacking & monitoring of electronic surveillance & eavesdropping equipment placed in the Jefferson County Court House; restaurants; offices; Jefferson County Community College; Public Library; the apartment's of citizens; in citizens automobiles; the use of radio frequency detectors on public roads; the monitoring of internet activity; especially the Plaintiff's; then using the information gathered through the electronic & physical surveillance in the production and broadcast of radio & television programming streamed to the general public using the cable television networks which have been hacked into by unknown government agencies that gather the television programming sent out by the cable television companies then re scripts them to include announcements and punchlines which include the illegally gathered information; and other contrived information into the television broadcasts then rebroadcasts the programming to the general population of geographic areas & New York state county jails & the US prison system to include the NYS Department of Corrections; various radio stations participating in this “Program” broadcast programming keeping with the same depraved genre & storyline that uses the illegally gathered & contrived information from the illegal surveillance in order to broadcast messages to the civilian & prison populations of upstate NY jails & prisons; thus controlling the behavior of both populations, 13) the deliberate illegal manipulation & orchestration of society through legal & illegal television and radio broadcasts that have been produced within this saga which was written around my life; the producers of the radio station programming involved in this change the lyrics to popular music mainly hip hop and make announcements in order to disseminate information and manipulate society against the Plaintiff through his harassment; defamation; and deliberate inconvenience; law enforcement and other state agencies then orchestrate the movements of the participants in this, 14) to make the cause of this situation totally impossible to discern due to the massive and continuous violations and flood of information taking place on a 24 hr. basis, 15) the “Program” has also been used to make the phrase used in Court Documents, “The People of New York v. Defendant” literal and a legitimate goal, 16) to allow the

government to be deliberately indifferent to the needs of its people, 17) to deliberately destroy the Constitutional rights of inmates and citizens, 18) to prevent the resistance of society and organizations to this by coercing their involvement; to make the unequal treatment of a portion of society totally legal IE. Prisoners, 19) create a system that is self perpetuating with a society of capitulant citizens & inmates, 20) to control the media, 21) to create and eliminate targets of the government, 22) bilk the US government of Federally provided funds to law local; state; and Correctional authorities 23) illegal commercialization of the subject's life which deliberately has the Plaintiff linked to people; agents; various criminal organizations; and others that he has never been involved with thus knowingly; deliberately; and willfully using the Plaintiff as a straw man, 24) deliberately engineer a hostile environment for the subject; subject's children; family; and associates through the perpetuation of this, 25) use of the Plaintiff as law enforcement's solution to a haphazard and free society through the manipulation of the populous using the Plaintiff as the subject of an evolving conspiracy against him which is sponsored by the US government and carried out by the state and federal agencies, 26) make it acceptable to society to become an informant or report to a state or federal actor, 28) and to allow the different law enforcement agencies to gather information on one another; namely the Inspector General; Federal; and State agencies investigating and attempting to control this. Plaintiff's use as the subject of the "Coercive Population Control Prison Program" continued even after I was transferred to NYS DOCS on March 8, 2012. This "Program" has deliberately been transformed into an ever evolving interactive conspiracy. Many of the goals of the "program" have become after effects of the "Program's" initiation, and have been controlled by certain government officials in order to suite their needs.

(c) The design of the "Coercive Population Control Prison Program":

The Prison "Program" was commissioned and funded by the Department of Justice; it was designed by top professionals in the fields of law, psychiatry, corrections, law enforcement,

government, telecommunications, technology, and others. The “Program” is classified and was implemented over the course of unknown period of time with a significant cost to the tax payers. The “Program” has transformed into an ever evolving fluid situation that uses real life people as actors within different populations of human society being prisons or different geographic areas of this country such as Jefferson County and other countries.

The “Program” was designed to counter every avenue of legal recourse that may be used to fight it. Federal and State authorities circumvent legal statutes through their deliberate misuse and interpretation of fisa laws. The "Program" was designed factoring in the tort liability of state and federal actors, and the immunity of state and federal actors such as judges and district attorneys. This company deliberately uses private companies under the control of the government in order to limit government liability. This company also prevents lawsuits that could be brought as a result of this “Program” by entering into contracts with the entertainment industry making the manipulation of their work product used for the manipulation of the populous totally legal. The contracts between the various record companies, television personalities, cinema production studios, cable providers, internet providers, radio stations, television stations, news stations, web sites, periodicals, and others allow for the change of their work product IE. Songs, movies, television programming, and other media no matter how depraved or what the consequences may be.

The design of the “Program” exploits several psychological principals inherent in every human being, and include its own language of phonetics. First and foremost this “Program” takes advantage of the human beings need to fit in or to belong to something good or evil called the “Mob Mentality”. This becomes prevalent and uses greater force in microcosms such as small towns. Secondly, it takes advantage of certain personality traits in human beings such as the desire to be cruel, shift, and the prevalent fads & ideals of culture of this country at any given time.

The depraved nature of the programming used in this “Program” appeals to the masses, and

holds a high entertainment value to a wide range of people: poor, middle class, rich, Hip Hop Artists, and entertainers. The broadcasts are entertainment by nature due to the medium it is delivered in which are television and radio. These two mediums are two of the established pillars of US society and have been used to manipulate the civilian population and rapidly disseminate information for over a century. These two medium have been used by this government in conflicts such as the Cuban Revolution and Bay of Pigs Invasion to disseminate false information to foreign populous and now have the audacity to do so on American soil, and deny this is happening.

The "Program" was also designed to take advantage of the street culture and the modern day desire of the the US population, especially the youth to be involved in illegal activity. It uses the heroes of the youth of today in the form of Hip Hop artists who glorify criminal figures and activity in order to disseminate the information in order for it to have mass appeal.

The "Program" was designed to be used in the most inhospitable environment on earth known to mankind which is prison in order to force the most hardened inmate to capitulate and assimilate. The small confines of the cells, the noise, threat of violence, sexual assaults, lack of the comforts of home, lack of communication with the outside world, the acceptable brutality, criminal activity, and deprivation of human rights makes prisons the ultimate proving grounds. Prisons provide for the perfect environment for the total and deliberate restraint of a prisoner. That and the fact that there is so much overlap of security, and collusion of various law enforcement agencies such as the FBI; DEA; DHS; ICE; State; and local police makes the prison systems the ultimate shadow government allowing law enforcement to cover up and perpetuate their illegal activities.

A system of phonetics has been developed in conjunction with this "Program" and system. The phonetic system developed in conjunction with this "Program" is crucial in the perpetuation of this ever evolving conspiracy and "Program". This system of phonetics uses a system of numbers in combinations as well as alone, letters, pronouns, verbs, colors, sides of the body such as right & left,

physical signals, groups, number signals, and terms in order to control the human populous both inside and outside of prison. Each number, pronoun, etc has a distinct meaning in this "Program", and is used to transmit messages within the hidden meaning of sentences.

This language of phonetics used in conjunction with this "Program" is readily used on live television, in song lyrics, movie scripts, radio station programming, the Bible, books, periodicals, bill boards, advertisements, commercials, by government officials in open court and other places, television personalities, news broadcasters, actors, radio station personalities, hip hop artists, athletes both professional; college; and others, law enforcement officials, and others. This language of phonetics uses pronouns in the place of government officials' names and others who are involved in this who are making decisions that affect inmates and citizens lives on a daily basis in order to protect their identities and cause confusion.

The substitution of names with pronouns is not limited to government officials, but has included hip hop personalities and entertainment personalities as well as other prisoners who are participants in this. Inmates, law enforcement, and other participants in this are designated the pronouns, numbers, and other terms used in this phonetic language in order to multiply their power. For example an inmate might be labeled a my or a me. Thus, the inmate is to acts as they are designated. If Me or My is a friend to the Plaintiff then the inmate designated as such is to act as a friend as well, if Me or My is an enemy then the inmate designated as such is to act as an enemy as well.

An example of a statement using a pronoun in the place of an official's name is, "Me says that you're a fagot"! Another example is, "They say It blows U all the time". A person designated as "It" is normally someone who performs the services of a prostitute, runs the street, sells drugs, etc. "It" can be male or female. The term "It" is also used to designate the streets, street life, and prison. If I state that I have been in "It" my whole life, essentially I am stating that I have been in the street life for my entire life.

The pronouns are also used to designate and describe the behavior expected in a certain area, geography, or populous at a particular point in time. The correctional officers³ will announce on the tier that the showers are “In”; meaning that inmates are expected to remain peaceful while in the showers and there should not be any fighting in the showers. Announcements are also made before going to the yard that the yard stays in. The term “In” is used to designate the expected behavior of inmates in the designated area being the recreational yard. The pronouns such as “In” is also used to designate the behavior of a particular group of individuals inside prison and outside of prison. CO's would state, “Right's staying in here”. This statement means that Blood is staying peaceful in this particular prison or in a particular place or geography.

The opposite behavior could also be designated for a particular place and time. CO's would state, “Right's going out for him or if you wanna go out take it to the yard”. This statement is the opposite of staying in. To go out means to have a fight or put work in. The term “Out” is also used to designate the inmates and others involved with the Outlaws who are a classified as a disruptive group in and outside of prison.

This system of phonetics is used to openly discuss illegal activity, to have conversations about developments occurring on a daily basis, or to harass; intimidate; and defamation Plaintiff in open forums such as court rooms, public areas, on the radio, television, periodicals, etc. One example of this practice taking place in open Court occurs in my sentencing minutes of February 28, 2012. Judge Todd states, “You said that you wanted to do this”. The pronoun you sounds like the letter and vowel U which is used to designate one of the government officials involved in this. The proceeding sentence is meant to read U told Judge Todd that the defendant was willing to be sent to prison and participate in this.

This system of phonetics uses numbers to designate certain groups as well. The main numbers

3 Correctional Officer's will for now herein be known as CO's

used to designate groups and the behavior of certain of them are 2, 4, 5, and 6. In this system the number groups can change colors or be associated with certain colors designated by the government. The number 2 is used to designate the Muslims, Gods, unity, and are associated with the color green. The number 4 is used to designate the mafia, and their primary color designation is silver. The number 5 is used to designate the crips, the left side, and their primary color is blue. The number 6 is used to designate the bloods, the right side, and their primary color is red. The numbers in this are run by different government groups or officials, can change colors and sides dependent on the day or the needs of the different government actors.

The orchestration of this continues on a daily basis outside of prison. I have included a detailed list of the terms, pronouns, numbers combination of, colors, physical & number cues, and their meanings used in the phonetic system, please see the exhibit labeled Appendix.

(d) The "Prison Program" as it relates to the Plaintiff has been this company's use of the "Coercive Population Control Program" inside and outside of prison in order to deliberately engineer a Hostile Environment against the Plaintiff, the Plaintiff's children, and other members of his family. This deliberate orchestration and engineering amounts to the deliberate denial of my constitutional rights under the US Constitution and the New York State Constitution which amounts to deliberate denial of the Plaintiff's liberty and the liberty of his children.

Plaintiff's restraint of liberty, cruel & unusual punishment, denial of due process, etc. amounts to his constant and calculated harassment on behalf of this company. This company labeling and then using the Plaintiff as the subject of the "Program" is responsible for; encourages; and has fostered an environment that is responsible for the defamation of the Plaintiff, Plaintiff's children & family. This company is responsible for the stalking of the Plaintiff; children & family, illegal surveillance electronic & physical, the deliberate illegal dissemination of my private information by using various electronic means such as television & radio to include the use of XM radio broadcasts, this company

has deliberately released and has encouraged the dissemination of my picture so that everyone would be able to identify me in JCJ; prison; and throughout the nation so anonymity would be impossible. This company is responsible for the illegal and deliberate dissemination of the Plaintiff's private to include and not limited to the following information: my FBI file; classified information pertaining to myself and others are deliberately leaked to the civilian population and US Prison population; records from my military service record book; family history to include family members information; NYPD test scores; Foreign Service Officer application & test scores; work history; salary history; known associates; and other private information in order to target the Plaintiff; his children; family; and associates.

This company has deliberately caused the illegal commercialization of my life by using myself; my children; my family members; and associates information gathered in its unwarranted and blatant invasion of privacy in the production of its television and radio broadcasts. This company through the orchestration of federal, state, private, and local assets continues to orchestrate the hostile environment I along with the others I have mentioned above are forced to live in on a daily basis. The Plaintiff enjoys none of the benefits of commercialization such as fame and fortune. I suffer from the negative byproducts of fame such as being recognized; being followed everywhere I go; and the conjuring of rumors about my life and what has happened. I am not allowed any of the positive byproducts of fame such as wealth, power, women, and notoriety.

This depraved "Program" even broadcasts the plans & execution of my eventual murder through television and radio broadcasts on a daily basis. State and federal actors such as the SIU and other law enforcement openly share developments in this ever evolving conspiracy against me. airways and my murder plot is deliberately disseminated by state and federal actors using official equipment purchased by the tax payers. This company is using the Plaintiff as a straw man and has created false associations with people & law enforcement personnel that I have never met. I have been labeled as

gang affiliated, and tagged as an informant & a gay. This company has been using the Plaintiff's life as an interactive video game which is orchestrated by the radio and television broadcasts made in reference to this conspiracy on a daily basis, and has created a hostile environment inside of prison which persists outside of prison. The illegal commercialization has hundreds perhaps thousands of people in and outside of prison involved or attempting to become involved in the lives of the Plaintiff and the Plaintiff's children. This company has deliberately created an environment where the Plaintiff, Plaintiff's family, and children are constantly, deliberately, and calculatedly harassed on a daily basis by persons whom we don't know under the orchestration of the radio, television, federal & state assets. This amounts to calculated harassment, conspiracy to deny civil rights, conspiracy to deny civil rights, conspiracy to murder, denial of the equal protection of laws, the deliberate restraint of my liberty outside of the conditions of Plaintiff's parole, behavioral modification, the illegal seizure of human beings to participate in this, and every other violation of the US and NY State Constitution.

(e) The general ideas governing the genre of entertainment and general guidelines of this depraved "Program" outlined herein as follows:

The Plaintiff, ex-wife, and children are classified as "things" for myself this means that I am part machine to be controlled as an inanimate object. Being treated as an inanimate object within this system means that state & federal actors along with others such as inmates are allowed to designate our classifications or desired behaviors. These classifications are essentially governed by the system of phonetics developed in conjunction with this program. An example of being designated a classification is that an unknown state or federal actor or inmate would give an order stating, "The 'The Shit' stays in". I have been code named "The Shit". The word "in" used in this system means that I will stay peaceful.

My designations or classifications change on a daily basis. I could be designated 4, 5, 6, in or out on a daily basis. These designations are supposed to govern my behavior and responses I receive

from the civilian or prison population on a daily basis. This occurs on a daily basis even though I have no ties to any threat group or criminal organization. The deliberate association or idea that one could be deliberately associated to any of these groups designated by the system of phonetics places the subject his children and others in an inordinately high level of danger on a daily basis.

The general premise governing persons involved in this is that everyone else present around us belongs to a group that has been designated by the State and Federal government as a threat group, my daughters and I are basically under the influence of actors who have the job of harassing us and controlling our behavior. These actors are virtually unaffected by this system, yet we being my daughters and I are totally in restraint of this. This is the word used as a place holder for the total system of deliberate restraint that we are the subjects of to include the radio and television broadcasts that provide the instructions and updates to the populous which in turn acts against us.

This system countermands any and all laws of this land, and deliberately places the civilian and prison populous in restraint of liberty. This system which is in place in every jail and prison in the United States countermands any type of law and order that has been established in this Country, especially that of Correctional law which is designed and used to counteract any type of threat group activity. Instead, the individual states of this country and Correctional Agencies promote this type of system in its jails in order to sustain an illegal and deadly economy geared to increase the wealth of persons under the color of law and to control the population.

The general premise behind this "Program" is to use someone as a subject in an environment that is under total control of the experiment's architect in this case is the State of New York and the Federal Government of the United States of America which is in total collusion in this. The "Program" uses the Plaintiff; his children as the subjects of the system amongst hundreds and thousands of people who are used as actors, and manipulated by the radio and television transmissions against them. It has already been established that I am this company's hit or object of extermination. The system as I call it

is used against the subject of the “program”. Each part of the system which includes:

telecommunications systems such as telephone; television; internet; etc., court system & legal system with its corrupt lawyers and their colleagues, politicians, state offices such as the Department of Social Services; Office of Children & Family Services, Federally run offices such as the US Postal Service, law enforcement personnel, the media, other personnel under the state color of law, and the general population of prison & free society have been turned against the Plaintiff as subject of this depraved “Program”.

The general populous of prison and different geographical areas of the country such as Jefferson County NY and now Christian County Kentucky are now being used as a battle ground in this. The populations are divided into different threat groups which are divided into two sides the left and right and are placed under the command of state and federal actors who issue orders to these groups. These groups include: bloods, crips, gods & Muslims, white supremacists, the black hand, the mafia, black mafia, Latin kings, and others. Some of people are divided and assigned to the groups based on the color of their skin as well. If you are brown skinned you might be labeled as part of the black hand etc.

The Plaintiff and his daughters are used as the subjects of the entertainment used in this “Program” deliberately causing the dissemination of their private information on the radio and cable television system. The entertainment is depraved in nature do to the fact that it is used to inflict unwanton psychological duress on the subject of the “Program”. The entertainment used in this “Program” also includes the announcement of who has agreed to become confidential informants or snitched during this, the announcement of crimes which have been facilitated against participants in this to include murders, and other updates to include who is investigating this along with who has gotten charged or arrested during this. The updates are made as entertainment on television and radio broadcasts both of which use the altered content of its media in order to disseminate information.

The general idea behind this multimillion dollar depraved dupe and “Program” is that the

Plaintiff and his daughters' lives are used as live entertainment in different geographical populations using our private information in the entertainment broadcast on the radio to include XM radio channels, internet radio channels, and cable television broadcasts. We are the only ones objectified, and toyed with as such. Plaintiff's life is treated as an interactive game who's survival depends on moves made by state & federal actors involving the consumption & replenishment of drugs, prostitution, and other criminal activity that I have absolutely nothing to do with. It is assumed that every single person in this country has to report to someone or be part of a group. The fact is that someone's assimilation or cooperation in this system is assumed. It is not if someone will become a confidential informant, but when.

My time alive is supposed to be running out as if there has been some finite limit placed on the time I have left just as the Nickelback music video 'Savin Me' implies by using the superimposed images of a numerical clock running down to zero over the heads of the extras in the music video. Everything that I have thought said and done in my life has been used in announcements made throughout this conspiracy on television and the radio stations. Announcements are made on live radio and television about the conspiracy against me and who is behind this and why to include the plans for my death. State and Federal Actors attempt to control everything in my life and in other peoples lives to include who I can see personally.

The whole US population has been trained to treat the Plaintiff differently. The basic premise of the behavioral modification is that I am the thing to be detested and never accepted by anyone, betrayed by everyone in his life to include his family who has outcast him, I am to be singled out and harassed anywhere I may be or come to be. The Plaintiff's ex-wife and his story was deliberately contrived by this company and its agents then deliberately disseminated to the public in order to facilitate his death.

(f) Deliberate and depraved orchestration of society against the Plaintiff:

On a daily basis the orchestration of the inmate population of the jails I was incarcerated in took

place against me and around me. Each day I was deliberately singled out used as the focal point of each jail I was incarcerated in and exposed to high levels of danger for the entertainment of the Correctional Officers, inmates, and staff. My assaults etc. were planned out on a daily basis according to a written plan which included a complex time frame of events that were to be carried out under the direction of certain state & federal actors who are involved in this. The prison society was and is presently manipulated using the cable television broadcasts and radio station broadcasts as well as the direction of inmates and correctional officers who wanted one of two things; either to see me assaulted or protected. This manipulation of the prison populous is known as innning a jail. When I wasn't assaulted by certain inmates or groups jokes were made that a particular inmate or correctional officer would have to "Come Out". The term "Coming Out" means that the person would have to admit that he was gay. This illegal "Program" and not the Correctional Law nor the inmate movement and control manual govern the NY State jail and prison system at a cost of millions of dollars to the tax payers of this country.

Plaintiff was released from Coxsackie Correctional Facility on July 30, 2013, and placed on Parole. I was released back to Watertown, NY Jefferson County as a homeless; indigent parolee where the orchestration of society against me continues, and was known that this would continue as outlined by the continual funding & budgeting of this "coercive population program", plan, time line, relocation of government assets to include federal law enforcement monitoring vans; soldiers; DEA & ICE agent; SID's; SIU; and others. I was deliberately sent back to Jefferson County to become the subject of the "coercive population program", to be used as bait, and the focus of a geographical area with the knowledge of the Department of Parole. Plaintiff's parole transfer request is being delayed deliberately on orders of government officials who are orchestrating this.

The Correctional Officers, Watertown Police Department, SIDs, and Jefferson County Sheriff Deputies that my ex-wife was involved with are still all in Jefferson County, and literally detest me.

Their goal is to lock me back up, and they harass me every where I go.

I am monitored electronically & physically by a combination of law enforcement , citizens, and confidential informants on a 24 hr basis seven days a week. The geographical area of Watertown, NY is 9.3 square miles and provides for the optimal environment to monitor and harass a subject; especially since Plaintiff's license has been revoked and I have no ties to the area. Small towns are the proving grounds for law enforcement and snitches due to the fact that everyone knows everyone's business and the small town mentality is the town's people versus outsiders.

There have been electronic monitoring devices in the walls of the last two residents I have lived in, and my present residence. The Plaintiff's monitoring includes telephone conversations, emails, facebook, physical locations at any time of the day, and his internet activity is incorporated into the entertainment broadcast on Sirius XM radio channel, YouTube Channels, re scripted programming shown on the cable television channels, and disseminated by word of mouth through the small town by state & federal actors and others. This saga includes the live broadcast of my daughters daily lives as well and other people who have been associated with the Plaintiff to include their names. The population is directed to use their names in the stories that they are encouraged to make up on a daily basis and disseminate throughout this area and others.

Each day state and government assets such as law enforcement, ambulances, and others are orchestrated on the routes the Plaintiff takes in order to get to the gym, work, or other destinations. I am used as bait and deliberately made a target by threat groups run by state and federal actors involved in this and others that participate in this through listening to the announcements and entertainment disseminated through the illegal broadcast of the cable television and radio. When one group or person or another doesn't assault the Plaintiff an announcement is made that "_____ played pussy for him this morning or today, etc". These scenarios take place on a daily basis.

The latest use of an illegal electronic surveillance that was used publicly took place yesterday

on December 12, 2013 while I was attempting to workout at the Fairgrounds YMCA. Around 2pm I spoke to Ms. Higgins who is the Chief Clerk of the Christian County Family Court where I have been attempting gain visitation rights to my biological daughter Alyssa. On November 19, 2013 Ms. Higgins on the phone told me that the Court date in reference to visitation of my daughter was set for December 16, 2013 @ 10:00am and was assigned Docket Number 13-CI-1077. December 12, 2013 I was told by Ms. Higgins that I had put the wrong date on the notice of motion for visitation; that the court date was set for December 18 @ 10:00 am and that I had to cal back for another court date.

After this conversation I became furious, and I immediately called my brother to explain how yet again whoever was in charge of this now was interfering in the Family Court in Kentucky. While at the YMCA; I overheard two people I know to be cops discussing how the Court Clerk was instructed to switch dates and that she was instructed to tel me the wrong date by the SID. The Plaintiff's illegal monitoring and the information gathered from the illegal monitoring is gathered and broadcast in real time to the prison, civilian and law enforcement populations of unknown jurisdictions.

The daily developments of my life and my children's lives to include any piece of information from my past and present are disseminated by incorporating them into the television and radio broadcasts. Modern technology allows for the immediate dissemination of information in real time, and this system was engineered and planned out for this. I have been made the center of the Watertown, NY populous. This whole orchestration is observed by government and members of the public on television just as Jim Carey in the movie the 'Truman Show' was unknowingly observed and monitored by television viewers across the globe. I believe that pieces of this system were actually inspired by the movie.

(g) Classified information revealed & the streaming of live information to the General Population of Jails and Geographical areas as follows:

The classified fact that was deliberately leaked about the Plaintiff by this company its actors and

others is the fact that when I was born a bug was surgically implanted in the Plaintiff's abdomen under the guise of a hernia operation allowing the government to be able to see what the Plaintiff thinks, hear what the Plaintiff says, allow for two way conversation almost telepathically, and hear what the Plaintiff hears through radio frequency signals and an up link to a satellite much like how cell phones functions. The device's battery is charged using my body's electrical current. The device was attached to the spinal cord at the base of the coccyx bone, between the anus and the coccyx bone. The placement of the device at the base of the spine allows for it to communicate with the brain using my body's natural biology in the spinal cord. The placement of the device makes it almost impossible to detect with the use of Correctional technologies such as the Boss chair which is used to detect metal in an inmates anus. The only way that I know that the device is working is that I experience ringing in my right or left ear.

The surgical implantation of the bug within the Plaintiff was part of a larger plot to create a New World Order accompanied by an army of human beings that could be used for various government purposes and applications. Imagine an Army of human beings that could communicate with one another without cell phones or radio equipment? Real time video, pictures, and other intelligence can be sent to the Plaintiff instantly. People with this implant can be used as a super soldier, super cops, super politicians, or any other government application imaginable. This implant would make the millions of dollars the defense industry spends on super soldier programs and miniature communication equipment unnecessary. Instead, this company got a hold of this information and is actively using me as entertainment and the center of their idiotic society.

The technology needed to be able to use this device didn't exist in the 70's, 80's or 90's. The development and deployment of cellular and satellite technology has allowed the use of the device within me. The surgery was performed by an unknown surgeon shortly after my birth. I have two horizontal scars a hand width above my penis as proof of the surgery. The government has seized the

Plaintiff from birth and now denies my existence or what is inside of me. The government deliberately caused my situation and is deliberately indifferent to my situation due to the fact that they would have to compensate me millions of dollars for my life as I am unable to talk, socialize, feel safe in my own thoughts, or form normal relationships due to the fact that everyone knows my story and what I am. I am not revealing top secret information that I have been privy to or that I have known about prior to my incarceration and use as the subject in this depraved "Program". However, I am revealing the information that I have been able to gather, reverse engineer, and infer from being the subject of this system for over ten years unknowingly and the past two and a half years blatantly in the open as there are well over a million law enforcement and government participants in this and well over half the US population.

My everyday conversations, thoughts, writings, and any other ideas contrived from my brain are used in the entertainment of the civilian and prison populous on a daily basis continually and deliberately. All the information illegally seized from my brain such as memories, through my speech, the conversations or interviews that I have had with unknown members of law enforcement speaking to me from an unknown location IE. telepathically, and what I have heard is stored electronically and classified. The the things I say and think are what governs and drives the orchestrated environment around me. The majority of what I say is controlled by the programming which is engineered to belittle, oppose, and negate my accomplishments in this. One such accomplishment is the Plaintiff's survival of prison, legal pursuits, the past connections that I have in the streets, and anything else that I could accomplish.

I was unaware of the fact that there was a government conspiracy or a bug inside me until very recently when I was told that all this was done due to the fact that certain agents who are part of this company revealed this information and used me as the subject of this "Program" in order to have me tortured and killed so that the government could recover the object inside of me as I am a liability and

have been severely compromised by this company. The government has invested millions of dollars in this and is hell bent on causing my death. My whole life has been seized illegally as has my whole life has been illegally classified and now deliberately burned so that I could never have a normal life.

The Plaintiff and his daughters are subjected to danger from this countries civilian, law enforcement, and the foreign services of other governments due to the deliberate leak of this information, and this government is deliberately denying these facts although they actively have DHS, FBI, Secret Service, Military, Special Forces, CIA, NSA, DOJ, DIA and others involved in this due to the classified information being deliberately leaked in this "Program" which is sponsored by the US Government. NY state and the US government are well aware of the situation they have caused and its repercussions and refuse to stop this.

The government is now actively preventing the discovery of the device within me by having the X-rays I have had recently taken at Northern Radiology of Watertown, NY on September 12, 2013, and the set of X-Rays I had taken on September 30, 2009 at the Chiropractic Health and Wellness Center in Sterling, Virginia altered and confiscated by an unknown Federal actor. After I left Northern Radiology I was able to observe a person who is known as a government agent to me drive up to the building exit his vehicle and proceed to the Northern Radiology Office located on Outer Washington Street in Watertown, NY in order to confiscate my X-rays which are known as classified material, please see exhibit 3.1-(g) copy of the X-ray disc provided to me by Northern Radiology; printouts of said X-rays from Northern Radiology, and Print outs of X-Rays from the Chiropractic Health and Wellness Center in Sterling, Virginia. The government will stop at nothing to conceal the device that is within me and is currently privy to the information that I am typing through the use of the device and the monitoring of my lap top computer.

3.2 Lack of legal references

JCJ has inadequate law library facilities. The JCJ law library consists of an incomplete set of

McKinney's Penal, Criminal Procedure Law, and no forms. The JCJ law library contains no information on filing lawsuits in Federal or State Court, has no information on the NY State Court of Claims, State or Federal Court Reporters, has no "JLM" Jailhouse Lawyers' Manual or similar publication, does not provide photocopying services, legal supplies such as carbon paper; pens; legapads; paper; certified mail slips or return receipts, and does not provide notary services on a regular basis or a dependable process to sign up for notary services.

I was transferred to New York State Department of Corrections, NYSDOCS⁴ on March 8, 2012 through Auburn Correctional Facility. I was then sent to El Mira Reception Center where I was placed on keep lock without notice or any specific reason, denied law library, showers, meals, and medical services for a period of at least two weeks. I was and am in fear of my life for bringing any type of lawsuit against the State or Federal Government.

The last week of March, 2012 I was transferred to Groveland Correctional Facility where I was assigned to Pred-GED classes by my counselor; Ms. Wiznewski and the Program Committee. April 6, 2012 I was packed up and sent on a court trip to Marcy Correctional Facility. I did not return to Groveland Correctional until the last week of April, 2012. April 30, 2012 I was placed in the Groveland Correctional Facility SHU⁵. May 2, 2012 I was sentenced to 180 days SHU confinement, loss of packages, commissary, telephone, recreation, and loss of good time. I filed my first post conviction relief motion in the form of a CPL 440.10 motion in May, 2012 while I was in the SHU.

Plaintiff did not have full access to law library facilities until I was assigned to D-Block of Cocksackie Correctional Facility the third week of October, 2012 when I filed my CPL 460.15 motion asking for leave to appeal in the Appellate Division Fourth Department, which was denied in January of 2013. There are only two law library sessions per day held in Cocksackie Correctional Facility from

4 NYSDOCS – abbreviation for the New York State Department of Corrections

5 SHU – Special Housing Unit

1pm to 6pm, & 6pm to 8pm weekdays; 8am to 9 am & 12pm to 3pm weekdays. Inmates are not permitted to use the Law Library in Cocksackie Correctional until placed in general population and unless placed on a call out which must be requested at least a week to two weeks in advance, and is not guaranteed that you will be able to attend the law library on the date or time requested.

In between my post conviction relief motions the Plaintiff was working on two Article 78 proceedings I filed. March, 2013 I filed my Federal Habeas Corpus pursuant to 28 USC 2254 in the US District Court Northern District, and have filed my last declaration in support of my habeas corpus after my release from Cocksackie July 30, 2013.

Plaintiff was also unable to file a claim in the NY State Court of Claims due to the fact that I was indigent for the majority of my prison bid, and the Court of Claims rules requires that any service of papers to it requires them to be sent Certified Mail & Return Receipt, please see exhibit 3.2 inmate account statements from Cocksackie Correctional Facility. I would have been unable to send mail certified return receipt as prescribed by the Court of Claims Rules & Regulations.

I was threatened on a daily basis that if I attempted to file a law suit against NYSDOCS that I would never leave prison alive. Plaintiff was deliberately used as the subject of the "program" run by the NYSDOCS in conjunction with the Department of Justice; DOJ⁶ in order to increase inmates' cooperation with law enforcement, create favorable conditions for confidential informants; rapists; and pedophiles to live in prison, and to produce confidential informants to work with the Special Investigations Unit; SIU⁷ which is a state task force specializing in gathering information in jails and prisons, and the SID the paramilitary branch of NYSDOCS which has connections to the National Security Agency; NSA⁸ ; military; DOJ; and the entertainment industry much like Hip Hop Cops.

On a daily basis I was harassed, intimidated, annoyed, defamed, tortured, and embarrassed

6 DOJ – Department of Justice

7 SIU - Special Investigation Unit

8 NSA – National Security Agency

through the use of electronic programming broadcast into the prison via local radio stations and cable television. The inmates and Correctional Officers; COs are used as state actors. My assaults amongst other ghastly events such as rapes were planned by the inmates and CO's alike. Each jail acted as a living breathing creature against the Plaintiff which began in JCJ in 2011 and has continued.

3.3 Pursuit of my post-conviction motions

The majority of Plaintiff's time incarcerated has been dedicated to the pursuit of my post conviction motions to have my conviction reversed. I have filed CPL 440.10 motion in Jefferson County Supreme Court, CPL 460.15 motion in the Appellate Division Fourth Department, and Federal Habeas Corpus pursuant to 28 USC 2254 in US District Court Northern Division. May 2, 2012 I was sentenced to 180 days SHU incarceration.

The Post Conviction & other Motions Filed and decided as follows:

On June 6, 2012 Plaintiff's CPL 440.10 was accepted in the Supreme Court of New York Jefferson County and assigned Index number 11-2419., August, 2012 I filed an Article 78 contesting my SHU sentence, September, 2012 my CPL 440.10 motion was denied by Judge McClusky, Oct. 31, 2012 I filed CPL 460.15 motion in the Appellate Division Fourth Department, January 8, 2013 Plaintiff's CPL 460.15 motion requesting permission for leave to appeal was denied by Hon. Judge Scudder, April 11, 2013 Plaintiff's Federal Habeas Corpus pursuant to 28 USC 2254 was accepted by the US District Court Northern District and assigned CV number 9:13 -CV- 0034 and assigned to Chief District Judge Sharpe, Plaintiff filed his last declaration pertaining to the proceedings in August of 2013, September, 2013 the proceedings to the Federal Habeas Corpus were closed for deliberations, September, 2013 Plaintiff's Article 78 was denied by Judge Cohen of Livingston County Supreme Court, and October, 2013 Plaintiff filed an Appeal based on the denial of the Article 78 in the Appellate Division Fourth

Department, October, 2013 I prepared and submitted Family Court Motions to Christian County Family Court Kentucky for visitation of my biological daughter, October, 2013 these papers were sent back siting that there was not a petition for visitation attached, November, 2013 I resubmitted these motions again to the court, The Family Court Hearing was set for December 18, 2013, December 11, 2013 I was informed that I had the wrong court date on my paperwork even after the Court had possession of the paperwork with the supposedly incorrect hearing date on them since November 18, 2013, December, 13, 2013 I called the Court and received another hearing date of January 15, 2014, I had the respondent properly served with the correct date on 12/16/2013, January 15, 2014 @ 10:00 a.m. the Family Court Teleconference was held in Christian County Family Court, January 17, 2014 my petition for visitation was denied, February 3, 2014 I filed my appeal of the denial, March 17, 2014 I filed my Family Court Brief in the Kentucky Court of Appeals, January, 2014 I received the records related to my Article 78 proceedings, April 3, 2014 I filed my Perfected Appeal with the Respondent and the NY State Appellate Division 4th Department to include a Stipulation of the records, April 22, 2014 I received the Perfected Appeal back from the Appellate Division siting insufficient copies of brief; unstipulated records, May 10, 2014 I received the Perfected Appeal back from the NY State Attorney General's Office with a letter stating that the records could not be stipulated, April 27, 2014 I submitted another stipulation to the Respondent and a motion to settle records to Livingston County Court, May 21, 2014 I submitted my brief and records to the Livingston County Court to be settled, May 21, 2014 I submitted paperwork to the Appellate Division 4th Department asking for an extension of time to perfect my appeal.

There are legal actions against several actors participating in this that are being withheld from the Plaintiff to include the secret investigation of this. Several law suits have lied against several of the major players in this by several of the actors to include my children that have been deliberately withheld from the Plaintiff for obvious reasons.

I have been able to submit these motions without any outside support from anyone, and while working menial jobs. I have worked as a Janitor/Cook from September, 2013 to March 7, 2014 at a wage of 9.50 hr receiving on average 22 hrs a week. I arrived in Florida on March 10, 2014. I began working for ProTouch Contracting on April 7, 2014. I have only received a total of 100 hrs at 10 per hour. I am being forced to attend a batterers intervention course in Florida at 24 dollars a class even though I was not directed to attend the class in NY by my Parole Officers. I face insurmountable obstacles yet I remain compliant, behaved, and diligent even while my life and the lives of my children have been placed in grave danger due to this.

3.4 180 day SHU sentence

May 1, 2012 I was served with a misbehavior report, exhibit 3.4-(a) while incarcerated in Groveland Prison. May 2, 2012 I was sentenced to 180 days of SHU incarceration, exhibit 3.4-(b). Plaintiff's incarceration in the Groveland SHU and then in Collins SHU where my access to legal assistance was limited to requests that I could make via the Law Library Request Forms, please see exhibit 3.4-(c). Being that I have never received any formal legal training, was unaware of how to perform legal research, and was unaware of what requests to make my incarceration in the SHU severely limited my abilities to process my legal maneuvers and post conviction motions. This, the cramp conditions, maddening noise, 100 degree temperatures, and being designated a target severely limited my abilities to perform my legal work.

4. The State of New York has had notice of the essential facts of my claim due to the following facts:

4.1 Coercive Population Control Program in Place

The "Program" was deliberately implemented in JCJ and every upstate jail by the State in order to produce confidential informants and accomplish the other illegal governmental goals as outlined in

point 3(a) of this affidavit. Jefferson County has the highest number of rats & confidential informants in New York State. JCJ Sheriff Deputies and NYS DOCS CO's all receive specialized training in order to perpetuate the illegal "Prison Program". These Sheriff Deputies and CO s are sent on trips to receive the special training. Therefore, special pay & trips are authorized by the State.

The State is aware of the inflated paychecks and the amount of overtime paid to the "SIU" & other members of Jefferson County law enforcement in order to monitor the Plaintiff through the use of physical and electronic surveillance. Along with my surveillance unknown state & federal actors deliberately orchestrate my harassment, defamation, humiliation, and intimidation on a daily basis in and out of jail. While I was incarcerated in JCJ the Jefferson County Sheriff Deputies deliberately orchestrated my harassment, defamation, humiliation, intimidation, and assaults on a daily basis under orders from unknown members of law enforcement who monitor JCJ from a building barely 100 yards.

JCJ Deputies and civilian staff are well aware that the television programming shown on the closed circuit television system is not normal television programming due to the contents of the scripts which are designed to annoy, harass, intimidate, humiliate, defame, and otherwise inconvenience the "subject" inmate. The depraved programming which contains scenarios such as the murder of his children is written and produced using the Plaintiff, Plaintiff's children, Plaintiff's ex-wife, and Plaintiff's family members personal information in order to inflict the maximum amount of unwanted psychological duress as possible on the "subject", and is deliberately broadcast on the closed circuit television systems of JCJ and NYSDOCS facilities. The depraved television programming was incorporated into the skits and scenarios used for my deliberate and daily torture while incarcerated in JCJ and NYSDOCS.

The depraved programming used to terrorize the Plaintiff is used to corrosively control the jail & prison population is presently being broadcast to millions of civilians, state & federal actors through illegal television & radio broadcasts in order to perpetuate the control of the civilian population by

continually using the Plaintiff, the Plaintiff's daughters as the subjects of the programming. On a daily basis millions of state and federal actors perpetuate this illegal "coercive population control" willfully and deliberately.

4.2 Television & Radio Broadcasts

The depraved programming is broadcast to the civilian population through the use of XM satellite radio, Internet radio, local radio, and illegal cable television broadcasts. The radio station broadcasts are facilitated by private, independent, and illegal government shell companies participating in this. The television broadcasts are executed by unknown government agencies who have cut into the cable television system seizing the broadcasts then re scripting the television programming, making ad lib announcements within the re scripted broadcasts, and then rebroadcasting the contents of the regular cable television programming to millions of citizens of this state and personnel under the color of state law & federal on a daily basis.

These television broadcasts are scheduled keeping the regular cable broadcasting schedules in mind creating a seamless re scripted stream of illegal government altered versions of the regular cable television programming. The production of the re scripted government programming is a major production due to the technical expertise, scheduling, budgeting, and the illegal relay of the programming to millions of viewers. The re scripted programming is deliberately used in this ongoing interactive conspiracy against me in my continual harassment, humiliation, defamation, conspiracy to murder, and the illegal commercialization of my life which is viewed by millions of citizens of this state and personnel under the color of state & federal law on a daily basis who then act against the Plaintiff as outlined in the programming and upon orders from the state and federal actors orchestrating this.

The fact is that the government of the United States and law enforcement of this state has

deliberately used the Plaintiff as a pawn in their illegal investigations of different government agencies and refuses to cease this illegal “coercive population program”. The Plaintiff is also used as bait, my life has been illegally commercialized and used as depraved entertainment for this sick backwards society, and the fact is that I am being used as the subject of an illegally orchestrated society with my death as the intended consequence of this.

The state of New York has implemented this illegal “Prison Program” state wide in order to produce confidential informants and to accomplish the goals outlined in Point 3(a) of this affidavit. The confidential informants then act under the color of law as directed by state actors and on their own in the various upstate cities, towns, and villages they live or are released to. Most are made slaves to various state & federal actors under the color of law and others. Jefferson County has the highest rate of cooperation with law enforcement after an arrest than any County in New York State. The total geographic area of Jefferson County and upstate New York is under control of this company who has implemented this illegal “Program” to control the populous through illegal means.

4.3 Special Training

New York state is well aware that JCJ Sheriff Deputies and NYS DOC's CO s receive special training in order to perpetuate the “program”. The techniques used by the Deputies and CO s are in order to perpetuate this are outlined in their training manuals which are written by state and federal authorities, and have been adopted as policy. The JCJ Sheriff Deputies have also been sent on trips to Federal Facilities such as Glynco, GA and other State run training facilities in order to receive specialized training necessary to perpetuate the “Program”. The costs of these trips are paid for by the State and have to be authorized as such. The same training is given to CO s in the NYSDOCs.

There has been a long standing policy that regular law enforcement and correctional officers be cross trained in each others professions in order to make switches in personnel seamless. This is done

so that police officers are able to perform the duties of correctional officers and the correctional officers are able to perform the duties of police officers. Several JCJ Sheriff Deputies to include Deputy Steinmeyer bragged about receiving special training by the Feds in order to orchestrate this "Program". Every JCJ Sheriff Deputy has received this training.

4.4 Inspector General & Internal Affairs Investigation

The Inspector General's Office in conjunction with the Internal Affairs Division has had an ongoing investigation in JCJ since my incarceration there. The investigators have been able to obtain video footage of disgusting conduct sexual and other between inmates, inmates and Correctional Officers, and the other misconduct through the use of pin hole cameras hidden in the cells of inmates and the PODS of JCJ. A hearing revealing the results of the Internal Affairs Investigation was held in June of 2012. Plaintiff was impersonated at this hearing in order to deny the fact that he had grounds for his post conviction CPL 440.10 motion under Cruel and Unusual Punishment. While I was in Collins SHU in Cell A-2-49-T the COs in the SHU used to make announcements on a daily basis about different things that were supposedly were occurring on a daily basis in the Jefferson County Court to include how a picture of my buttocks was taken during a strip search and then emailed to gay CO s in NYSDOCS.

The Inspector General and Internal Affairs Department were also investigating the suicide death , and an attempted suicide inmates in the keep lock block of Cocksackie Correctional Facility in 2013. There were also several complaints lodged with the Inspector General for assaults on inmates by correctional officers.

4.5 Newspaper & Media stories about the Jefferson County Sheriff's Department & NYSDOCS

The State is aware of the essential facts of my suit due to the fact that there have been dozens of news stories related to the corruption and law suits brought against the Jefferson County Sheriff's Department and JCJ. The latest story about the corruption and law suits filed by Jefferson County Sheriff Deputies against their own department is outlined in a Watertown Daily Times Sunday Edition expose October 27, 2013, exhibit 4.5.a. This latest news story outlines the serious issues that the Jefferson County Sheriff's Office is having, and outlines several lawsuits filed by Jefferson County Sheriff's Deputies Krystal G. Rice for \$50 million, and Janice M. O'Dell for \$9 million. The cover story also outlines the Jefferson County Board of Legislators call for the Attorney General's Office to investigate the Jefferson County Sheriff's Department on January 29, 2013.

March 28, 2013 news stories on News Channels YNN and WWNY 7 outline the Attorney General's Office criticism of the Jefferson County Sheriff's Department pointing out the fact that the Department does not have a mandate to operate as a Jail, and I quote, "The Jefferson County Sheriff's Office is operating as an unaccredited law enforcement agency", exhibit 4.5.b. These two stories continue to point out that the County doesn't want JCJ to have evaluations, and the fact that the Attorney General's Office refuses to authorize or perform a full investigation of JCJ or the Jefferson Country Sheriff's Department. A copy of the five page report written by the Attorney General of New York in order to placate the populous was also provided, exhibit 4.5.b. There are dozens of other stories that have been broadcast by the new media and written by different periodicals in reference to this subject.

4.6 Federal & State lawsuits against the Jefferson County Sheriff's Office, JCJ & NYSDOCS

The State is also aware of the essential facts of this case due to the fact that there are several other lawsuits in Federal Court against JCJ in reference to sexual assaults of minor inmates, assaults, cruel & unusual punishment, and other accusations against the Jefferson County Sheriff's Department. These suits are currently in litigation in the Court of Claims and US District Court Northern District.

July, 2013 while incarcerated in Coxsackie Correctional I requested records of law suits against JCJ for the past five years from the NY State Court of Claims and the US District Court Northern District respectively. I have received no response from the NY State Court of Claims and have been out right denied access to these records by the US District Court Northern District in October of 2013 due to the fact that I do not have an action against JCJ in their court as of yet. Several JCJ CO s have since been reassigned or forced to retire in order to cover up abuses in JCJ.

4.7 Claimants Assaults in JCJ

On five separate occasions I was assaulted while incarcerated in JCJ. Four of the five assaults involved Jefferson County Sheriff Deputies, and two of the five assaults involved inmates. The dates of the incidents are as follows: 10/9/11 @ 16:15, 1/30/12 @ 07:50, 2/18/12 @ 17:30, two other incidents are undocumented in the Plaintiff's JCJ inmate records. These assaults generated 87 pages of reports with respect to these incidents to include medical examinations after the incidents, please see exhibit 4.7 JCJ Jail & Medical reports. Numerous employees of the state were present during my assaults in JCJ. These employees included: CO Beutel, CO Thomas, CO Hopsel, CO McGargar, Sgt. Courtwright, CO Weston, CO Schneider, CO Kellogg, CO Steinmeyer, CO Evans, CO Gallamore, CO Odell, CO Cordova, CO Gaines, CO Murphy, CO John Doe, and CO Jane Doe.

4.8 Sentencing minutes & Post Conviction Motions

The State of New York had notice of the essential facts of my claim due to through my Sentencing of February 28, 201, CPL 440.10 proceedings Index number 11-2419, CPL 460.15 proceedings in the Appellate Division Fourth Department Index number KA 12-02078, Federal Habeas Corpus Proceedings in US District Court Northern District Index number 9:13 – CV – 0384 (GLS),

Article 78 proceedings in Erie County Supreme Court Index number I-2012-2907, Article 78 proceedings Livingston County Supreme Court Index Number 5011-2013, Article 78 proceedings in Rensselaer County Supreme Court Index Number 242416, and Article 78 Appeal proceedings in the Appellate Division Fourth Department Index Number CA-13-01838.

On February 28, 2012 in Jefferson County Supreme Court before Judge Todd the Plaintiff attempted to withdraw his guilty plea and openly described his cruel & unusual punishment, the dissemination of his private information, his assaults, the “coercive population program” used in JCJ, and how JCJ was used as a living, breathing organism against him in a closed court room. The court room contained only state actors to include: Judge Todd, two Court Officers, two Correctional Officers, Plaintiff's 18B lawyer; Mr. Neddo, Assistant District Attorney Seminario, and the Court Reporter. Please see exhibit 4.8 sentencing minutes of February 28, 2012.

May, 2012 the Plaintiff filed his CPL 440.10 motion on the following grounds: Court Corruption, Ineffective Counsel, Universal Plea Bargain Violated, and Cruel & Unusual Punishment. The District Attorney of Jefferson County opposed Plaintiff's motion, but conceded the fact that my universal plea bargain agreement was violated and vacated the Plaintiff's April, 2012 Trespass conviction in the City of Watertown Court. July, 2012 in my response to the DA's opposition I further described what took place in JCJ from August 4, 2011 to March 8, 2012, please see exhibit 4.8 - (a) CPL 440.10 motion, see exhibit 4.8 – (b) respectively.

October 31, 2012 Plaintiff filed paperwork in the Appellate Division Fourth Department asking for a certificate granting leave to appeal, please see exhibit 4.8 – (c). Plaintiff's motions contain the same information as the CPL 440.10 motions with further details of his abuse at the hands of NYSDOCS.

April, 2013 Plaintiff filed his Federal Habeas Corpus pursuant to 28 USC 2254 in US District Court Northern District on the following grounds: Involuntary Guilty Plea, Court Corruption,

Ineffective Counsel, Defective Indictment, and Cruel & Unusual Punishment. The motion was accepted in April 2013, assigned Index Number 9:13 – CV – 00384, and assigned to Chief Judge Sharpe for deliberation. I have expounded on all of the points in my State court motions in this proceeding and have supported my claims with over 500 pages of motions and documents. The Attorney General's Office assigned AAG Maerov to the case and has opposed my motion. I am attempting to have the court file reproduced, but this will cost the Plaintiff over 800 dollars in photocopying fees from the court. I am unable to provide this court with the full record in the Federal Habeas Corpus proceeding.

4.9 Grievances

Several inmates wrote to the Inspector General's Office after I was assaulted by Correctional Officer Beutel on 10/9/11 @ 16:15. There isn't an official grievance process or system in place in JCJ. In order to file a grievance in JCJ an inmate must request a grievance form from a POD officer, and submit it to the Sergeant who then has to approve the submission for the grievance process to begin. This process is illegal and contrary to the New York State Correctional Law, and discourages the submission of grievances by inmates.

Upon my arrival in El Mira Reception in March 2012 I was able to write a letter to the Inspector General of NYSDOCs in Albany, NY. On an unknown evening in March 2012 before dinner chow was run by the COs while I was in cell A-2-24 on the first tier of El Mira Reception my cell was opened, and I was called out to the COs bubble in the front of A-Block. A Sergeant sat at his desk with two blank statements on his desk. There were several other COs present. I stood in front of the sergeant's desk at parade rest. The sergeant was very agitated and angry.

The Sergeant asked me what was going on and I told him that I did not know. I told him that I

was not a snitch or an informant and he stated that he knew I wasn't. Several COs commented that I was a hit, and the Sergeant asked me if I wrote to the GUN⁹. When I admitted to writing the GUN; the Sergeant became very perturbed. The Sergeant began to point his finger in my face and yelled that I should never go to the GUN before speaking to one of us first. He went on to state that the only time I should write the GUN is if I spoke to someone and nothing was done.

He mumbled under his breath that this was why the Security Captain was calling him, and that I was an asshole. The sergeant told me to sign the blank statements in which I complied. He told the COs that I was probably a hit for the bloods. He then stated that I was on keep lock pending investigation; then ordered me to go back to my cell.

I was placed on keep lock status, denied showers, the use of the law library, sick call, telephone calls, and meals on several occasions. I was placed on keep lock for at least a period of a week. One day my cell was opened and two COs entered my cell and ordered me to pack my belongings into the two draft bags I was provided by them. I complied and after I packed up my belongings into the draft bags the two COs exited my cell with my property, and my cell was closed. The next day I my cell was opened and I was placed on the draft out of El Mira prison.

While I was serving my a portion of my SHU sentence in Groveland Correctional Facility I appealed Captain Kaiser's guilty decision of May 2, 2012 sentencing the Plaintiff to 180 days of SHU confinement, loss of recreation, telephone, commissary, packages, and loss of good time credits, see exhibit 3.4 - (a). May 2, 2012 I sent exhibit 4.9 – (a) to the Tier III appeals office of Disciplinary Review in Albany appealing my SHU sentence, notifying them of my abuse, and the need for protective custody on May 3, 2012. NYS Headquarters in Albany. NY received exhibit 4.9 – (a), denied my appeal of the Tier III and affirmed Captain Kaiser's decision in June of 2012 while I was in the Collins SHU, please see exhibit 4.9 – (b); letter from Albert Prak dated June 8, 2012, Director of

9 GUN – New York State Department of Corrections Inspector General's Office

Special Housing stating that they were in receipt of my appeal on May 9, 2012 and that their office had 60 days to review the decision. July, 2012 the Tier III decision was affirmed by Mr. Prack.

I arrived in Coxsackie Correctional Facility September 17, 2012 after serving a 135 day SHU sentence in Groveland and Collins Correctional Facilities. While in Coxsackie Correctional I filed several grievances with the IGRC¹⁰ Office and Mr. Killar the civilian worker in charge of that office.

On January 20, 2013 I filed exhibit 4.9 – (c) with the IGRC office. The grievance describes the “program” that I am the subject of in great detail. I was even placed on a call out to the IGRC office to discuss the grievance and was told that there was nothing the office could do, please see exhibit 4.9 – (c).

May 2, 2012 during my Superintendent Tier III Hearing, the Plaintiff did notify Captain Kaiser the hearing officer of the deliberately orchestrated 'Coercive Population Control Program' that the Plaintiff was subject to on a daily basis from the time that I was in JCJ – Jefferson County Jail which carried over into the New York State Prison system. Plaintiff informed Captain Kaiser of the high level of danger that he is subjected to on a daily basis, the release of his; his children ; & his family's' private information; the games & scenarios that I was subjected to and the deliberate endangerment of his childrens' lives on a daily basis, and how they were used as entertainment as well as the Plaintiff, please see exhibit 4.9 – (d).

July, 2012, Plaintiff filed an Article 78 challenging the May 2, 2012 Tier III hearing decision rendered by Captain Kaiser sentencing the Plaintiff to 180 days SHU Confinement, 180 days loss of recreation; packages; telephone; commissary. The paperwork used in the Proceeding Index # 2012-2907 filed in Erie County then transferred to Livingston County Court, this proceeding is now being appealed in the Appellate Court 4th Department NY. The file contains almost 1,000 pages.

April 11, 2012, the Plaintiff's Federal Habeas Corpus was accepted by the US District Court

10 IGRC – Inmate Grievance Resolution Committee

Northern District 9:13 – CV – 000384. The State represented by Assistant Attorney Maerov has filed several documents denying my allegations within. My Federal Habeas Corpus File contains almost 1,000 pages of documents & exhibits from both sides. The State has adimently denying the existence of the Plaintiff's well documented and proven facts to include a motion I filed to investigate the use of the 'Coercive Population Control Program' in which I was the subject of in June of 2013. The State is well aware of the allegations contained in this claim due to this motion.

December 13, 2013 @ 4:26 a.m. Plaintiff notified the Commissioner Andrea Evans of the New York State Department of Parole & Community Supervision of the terrible situation that the Plaintiff was forced to live in and the fact that I was the subject of the 'Coercive Population Control Program' being run inside and outside of prison, see exhibit 4.9 – (e) Plaintiff's email to Commissioner Andrea Evans of the NYS Department of Parole & Community Supervision. I did not receive a response to this notification either.

January 17, 2014 11:15 pm , exhibit 4.9 – (e), Plaintiff did notify the Department of Justice at their official email address AskDOJ@usdoj.gov of the deliberate continuous violation of my civil rights. I also included a copy of my initial draft of my Court of Claims permission to file a late claim affidavit, my letter to the ACLU American Civil Liberties Union, and the last motion I submitted to the US District Court Northern District in reference to my Federal Habeas Corpus Motion Docket # 9:13 – CV – 000384. Plaintiff has received no response to my complaint even after placing several phone calls to their office. The government its people, every single agency private or otherwise has been deliberately and depravedly indifferent to my complaints.

4.10 Unwarranted Wire Taps, Listening Devices, Illegal Monitoring of Internet Activity, Illegal entrance of domiciles by State Actors, and Illegal access of my locker in public area.

The State and Federal Governments are also aware of the essential facts of my claims due to the

fact that I am under illegal surveillance 24hrs a day seven days a week by the SIU, Parole/Probation Departments, Jefferson County Sheriff's Department, and other unknown law enforcement agencies.

July 30, 2013 I was placed in the Rainbow Motel 24480 Bradley Street Watertown, NY 13601 Room 123 by the Jefferson County Department of Social Services after being released from prison on July 30, 2013. I was secretly filmed by hidden cameras placed in the room along. Several members of the SIU monitored my activities from the adjacent rooms, namely the room next door Room # 124. It was from this room that the audio contents of the cable television programming that I viewed on the television in my room were changed to make updates in this ever evolving conspiracy against the Plaintiff. The Plaintiff's activities were also monitored on a daily basis from an OP¹¹ directly across the street by using a closed car upholstery shop.

On several occasions my room was illegally entered by unknown members of law enforcement and CI's¹² in order to gather intelligence in the form of my legal work product, exhibits, etc. The hidden cameras were used to monitor my activities while I was in the room, and was used in the produced entertainment used in this. Plaintiff's penis was photographed and the pictures were disseminated to the civilian population of Watertown. Plaintiff believes that this was done in order to correct the rumors that I had a small penis which were deliberately started while I was in JCJ. The Plaintiff's size of 8 ½ inches was now announced.

Each time the Plaintiff left his room it was announced so that the different personnel, civilians, and others involved in this were able to be in place for my journey to my destination. The small geographic area of Watertown, NY make this the perfect place to monitor a person. Each day the orchestration of assets around me begins with me leaving my residence. The Jefferson County Sheriff's Office uses the State of NY maintenance yard on Teal Street which is located about a mile away from

11 OP – Observation Post

12 CI – Confidential Informants

the Rainbow Motel where I resided as a rally point and has even stored its surveillance equipment in its trailer, please see exhibit 4.0 – (a) a picture of the Jefferson County Sheriff trailer I took on October 10, 2013 in the maintenance facility located on Teal Street. The Jefferson County Sheriff's Dept trailer was there so that they could rapidly deploy equipment on the roads surrounding the Rainbow Motel ,but also to be able to deploy its surveillance equipment at the Rainbow Motel. It is not a coincidence that I was able to find their trailer in the maintenance yard.

August, 2013 I was able to obtain a room with Stephen Byers at 24098 Route 12 Room# 3 Watertown, NY 13601. The room I rented came equipped with eaves dropping wires in the wall connected to the electrical lines in the walls which were placed there by the SIU with permission from the landlord. The Plaintiff's internet activity to include his facebook account are monitored on a daily basis as well.

September 24, 2013 I moved out of the room at the above, because I had an altercation with the landlord Jack after he was unable to enter my room due to the fact that I changed the locks. The Plaintiff was again placed at the Rainbow Motel Room#123. The same pattern of monitoring occurred on a daily basis. Plaintiff discovered the fact that my lap top was accessed by an unknown person, please see exhibit 4.0 – (b) October 13, 2013 a screen shot of another user name used in order to access Facebook on my laptop.

October 31, 2013 Plaintiff took possession of his new apartment in Watertown, NY. The same pattern of surveillance and monitoring continued. On several occasions upon my arrival at my apartment I have noticed that my legal work, exhibits, and identifications have been rifled through. There are eavesdropping equipment in the walls of my current residence as well which were installed with the knowledge of the building superintendent and property management company. The SIU has specialized equipment which allows for listening and broadcasting. In other words they are able to receive and send information through these high tech devices, and are able to make announcements

from fixed locations and on the move through the use of cellular technology.

Unknown members of law enforcement have an OP¹³ on the roof of my building and have hacked into the buildings hard lines such as telephone and cable lines. The Probation Department and unknown members of law enforcement use several of the residences in this complex as confidential informants at times using them to signal when I leave or arrive at my residence. The residents play along with the illegal cable broadcasts which include live updates of events on a daily basis in order to keep the Watertown populous up to date of developments in this ever evolving conspiracy and saga.

Unknown members of law enforcement, their CI s, and possibly others have made a copy of my thumb drive which I keep with me at all times as a back up to the hard drive on my lap top on several occasions. They were able to obtain a copy of my thumb drive which contains my legal work product to include copies of this suit, because I used to borrow locks from the front desk at the YMCA in order to lock my belongings up in the locker room. They may also have copies of my keys.

I believe that my IP address is being used as a unique identifier in order to be able to illegally send and receive private information from my lap top. The lyrics from music I have downloaded from the internet has been changed from the original song lyrics, just as it is on live radio; internet radio, and satellite radio. Plaintiff believes that the music downloaded onto his lap top is being changed when broadcast and I am hooked up to the internet. Law enforcement deliberately and illegally steers certain people to my Facebook account both in the form of friends or people under the category people you may know in facebook and outside of facebook , online dating accounts, and others. Plaintiff is unsure and is unable to tell if he is on the internet or a Sandbox environment which is totally under control of the environment. Plaintiff believes that in preparation for this thousands of hours of music, video, and other entertainment has been altered. These forms of media are altered live as well.

The Plaintiff's cell phone is being monitored and recorded by unknown members of law

13 OP – Observation Post

enforcement illegally and without a warrant signed by a Judge. The Plaintiff has been hearing clicking noises during his cell phone conversations since I purchased the Boost Mobile Phone on July 30, 2013. The monitoring presently being done from a nearby apartment in my building complex or a nearby school or house. December 31, 2013 I called Boost Mobile, and they have told me that I am not being officially monitored or recorded by any of their departments. My account is now on restricted status.

My telephone conversations, internet activity, physical surveillance such as my current location are then used in the production of the electronic entertainment such as radio broadcasts both internet and live, music, television broadcasts, and live entertainment in local bars. The entertainment broadcast is based on the storyline & the deliberate leak of my private information, contrived information, and updates of real events that take place on a daily basis in this ever evolving live conspiracy against the Plaintiff and his children.

March 10, 2013 I arrived in Florida after my parole transfer from New York state was approved. The same unwarranted invasion of privacy has continued to include electronic and physical surveillance in order to facilitate the manipulation of the human populous in this geographic area. The same SIU unit made up of law enforcement from New York continue to monitor the listening devices hidden in Air Conditioning system of my brother's house as well as the attic of the house. The whole neighborhood is filled with members of the SIU, Dept of Justice, DEA, CIA, NYSDOCS, DOS; Department of State, and other unknown government agencies.

The house that I am in now is under direct surveillance not for my protection but in order to facilitate the Plaintiff's surveillance by Law Enforcement; government and private entities to include several FSO or Foreign Service Offices to include the Chinese. The Plaintiff is also under surveillance in order to manipulate the traffic of this geography which include law enforcement, Florida Department of Correction, Federal Law Enforcement, Department of State, DEA, and the Department of Justice along with others. Unknown agents have illegally entered my brother's house in order to take copies of

my hard drive and my back up hard drive.

There is a cat and mouse game being played with the Plaintiff on a daily basis as I am used for bait and the entertainment of these sick sadistic people in different scenarios that are announced and set up by the different factions and private actors. Each scenario uses a system of mathematics where the months of the year are converted to their corresponding numbers; matched with the days of the week, and the times of the day to signify certain factions private and government groups who have been programmed to inflict harm and death on the Plaintiff. Such a bait scenario took place on May 7, 2014 at approximately 12:30 pm while I was working with ProTouch Contracting owned by Carlos Santana a former NYPD officer of 30 years.

My brother registered the van I am using to get to and from work. After registering the van my brother returned to the job site located at 22120 East Lake Loop Drive Land O Lakes, Florida which happens to be located on a lake. We went to the Circle K Convenience Store to pick up lunch. At the far end of the parking lot were three white males standing by the back of their white pick up truck. One of the males had a shamrock tattooed on his right cheek. This individual was having a fake conversation on his cell phone and using the camera on it to film myself and my brother enter the Circle K. These individuals were also looking back at a truck at the gas pumps; waiting for a signal. Just before leaving for lunch I did see a bald headed man in a small boat speeding across the lake. I saw the same man in an extremely damaged white pick up truck show up at the Circle K just before myself and my brother entered the store. I am not wanted or involved in criminal activity. You do not have to be the sharpest tool in the shed to figure out that the man who sped across the lake and then into a pick up truck was a Federal Officer. I have also heard that I was supposed to be drowned in the lake behind the house, because of my ex wife, and the fact that I am the target of this Company.

4.11 Deliberately Engineered Environment Jefferson County continued in Pasco County, FL

Every aspect of life in the municipality known as Jefferson County is deliberately & illegally engineered and monitored for this “Coercive Population Control Program” by various government agencies and law enforcement. Every public place in Jefferson County to include the Jefferson County Supreme Court, Watertown Library, the Downtown & Fairgrounds YMCA, Jefferson Community College, the Community Clinic of Watertown, Buffalo Wild Wings, and other places are bugged. I work out at the YMCA, am employed at Buffalo Wild Wings, and receive mental health treatment at the Community Clinic of Watertown.

Any place I am for a prolonged period of time is monitored and the conversations that I have in these places to include my residence is then broadcast to the general public through various radio, television, and announcements made at public places. The cable television system has been illegally hacked into by the government which broadcasts altered re scripted television programming on a 24hr 7 days a week. This is occurring nation wide in and outside of prison.

The public roads are monitored with Radio Frequency monitoring equipment so that certain individuals can be tracked as well. Announcements are made in public places such as the mall and Walmart that I will be arriving there. This behavior has encouraged criminal groups to become involved in this and to keep track of my movements as well. A special YouTube channel makes 24 hr updates based upon my surveillance.

Basically the surveillance gathered by personnel under the color of law becomes broadcast to the public electronically in a variety of forms. I am the subject of the “Coercive Population Control Program” here in Jefferson County using its citizens as the actors just as the inmates were used as actors in the jails and Prisons I have been incarcerated in. I will be made the subject of this “program” anywhere I go in the country or in the world as it has been inferred to me.

The radio stations be it XM or regular also broadcast entertainment geared for my harassment, intimidation, and defamation on a daily basis. I have several hundred hours of recorded television,

radio, and downloaded music to analyze. Therefore, every aspect of my life is deliberately, willfully, and illegally controlled by this company.

These same practices are being continued in the Plaintiff's new environment of Wesley Chapel, FL. The calculated harassment has continued. My every waking moment I am harassed from the time I wake up in the morning to the time I go to sleep. I was even written a speeding ticket on 4-2014 in order to attempt to make me more indigent than I am in order to prevent me from filing legal work. Even so that my license could be suspended and I could get violated for driving on a suspended license. Make no mistake the State and possibly this whole country even the world is involved and participating in this against the Plaintiff at times unless otherwise suiting the needs of these government agencies, law enforcement, criminal organizations, private citizens, and businesses.

4.12 Written Saga and Conspiracy

A story line and prison saga complete with a budget, events that were to occur on the inside & outside of prison, the assignment of various government assets, and a set of guidelines & rules that applied to my oppression & communication black out were written and implemented in preparation for this. Each threat group were assigned government handlers who in turn work with the leaders of these groups. There are parts assigned to the various government actors, private actors to include private business, children, convicts, inmates, gang members, entertainment industry members such as Hip Hop artist; radio personalities; television personalities; actors & actresses, models, Correctional Officers, Cops, Federal Agents, DOS agents, CIA agents, Army CID, DEA, FBI Agents, DIA agents, and other agents. A combination of these private, state, and federal actors make up the scenarios to this saga, and notify each actor through various means on a daily basis of their parts. Each of these actors follow a certain script and are directed by certain radio stations, television stations, and take instructions in person from state; federal; and private actors. Specifically it is the job of these people to prevent the

Plaintiff from obtaining any direct evidence from this and prevent him from finding out exactly what is going on or who the Plaintiff has problems with; being who is attempting to murder, maim, scar, or thwart his attempts to escape this. This behavior has been repeated on a daily basis for an unknown number of years against the Plaintiff and is conducted everywhere he goes; whether it be to the Post Office, grocery store, gym, work or any other place. It has been said that in order to encourage mass chaos that there are several different channels of this that are being followed by the various actors to include satellite radio, internet radio to include you tube, Pandora, cable television and any other method of media. The government uses confiscated property to include private companies, businesses, houses, cars, boats, jewelry, clothes, weapons, money, and drugs in order to carry on and facilitate this ongoing evolving saga. It is the job of this company and its actors to prevent me from finding a Door or a way out, and to totally shun and isolate me even though cooperation with the government is known as being a snitch in any sense of the word. This is a society orchestrated by law enforcement, the government, radio, and television. This society commercializes the violence and criminal involvement of these government and private actors in order to perpetuate the degradation of society and the fake economy that stems from this 'program' The government also uses houses, apartments, etc in different communities to orchestrate this. I face the calculated harassment, degradation, embarrassment, and inconvenience on a daily basis by thousands of actors via radio, television, and other methods. The scenarios include different way that I am to be harassed, mocked, harassed, assaulted, raped, or killed. These scenarios also include crimes perpetrated by the various faction, actors, and others against normal civilians. These scenarios also induce terrorist activities the perpetration of them and the glorification of them via electronic means. This is the deliberate commercialization of the various criminal groups encourages crime and civil unrest. I have been locked out of this society by this company, the deliberate commercialization of my life, and the lives of my daughters who have been used as entertainment. The saga and the events are ever evolving based on the events of my family's

life and other who are presently in my life. My life is in the total control of this Corrupt company.

5. At the time of the incidents outlined herein, Jefferson County Sheriff's Department and the New York State Department of Correctional Services, through its staffs at Jefferson County Jail 753 Waterman Drive Watertown, NY 13601, El Mira Correctional Center, Groveland Correctional Center, Collins Correctional Facility, Wendes Correctional Center, and Cocksackie Correctional Facility performed an investigation of events described herein. This investigation has generated reports with respects to the incidents described herein.

6. Several government agencies to include the Federal Bureau of Investigations and the Department of Justice are conducting an active investigation into this as well.

7. My failure to file a notice of intention in a timely fashion could not have possibly caused prejudice to the State. The State has investigated and interviewed several of its employees with respect the incidents described herein. Many of the employees if not everyone of them are still available to the Attorney General, to be contacted with respect to the incidents.

The incidents which took place generated 87 pages of reports to include misbehavior reports, force of action reports, and medical reports. The incidents which took place in NYSDOCS have generated an unknown amount of reports to include misbehavior reports. I have ordered my inmate records to include my grievance file from NYSDOCS on November 20, 213, and have received no further response.

8. By operation of Section 24 of the Corrections Law, I am without any other State remedy.

9. No previous application for the relief sought herein has been made to any other Judge of the Court.

WHEREFORE, I respectfully request an order granting my motion in all respects, permitting the filing of the proposed late claim attached hereto in the above entitled proceeding.

I declare under the penalty of perjury that the foregoing is true and correct

Executed on July 30, 2014

Eric Perez
PO BOX 7455
Wesley Chapel, FL 33545